

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**XIXIANG YANG, LILING LIU, and  
QIQI XU, individually and derivatively on  
behalf of Nominal Defendant**

**GR SUPPLY CHAIN MANAGEMENT INC.,**

**NOTICE OF MOTION**

**Plaintiffs,**

**-against-**

**ZHIYU LUO,**

**Case No.: 17-CV-02577 (JSR)**

**Defendant,**

**-and-**

**GR SUPPLY CHAIN MANAGEMENT INC.,**

**Nominal Defendant.**

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**PLEASE TAKE NOTICE** that the undersigned attorney Renee M. Wong, Esq., will move this Court, before the Honorable Jed S. Rakoff, Judge of the United States District Court, Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York for an Order pursuant to Federal Rules of Civil Procedure 37 for sanctions based on Plaintiffs' counsel's failure to cooperate in discovery and for an Order pursuant to Federal Rule of Civil Procedure 56 granting Summary Judgment in favor of the Defendant ZHIYU LUO as there is no genuine dispute as to any material fact and the Defendant is entitled to judgment as a matter of law.

The schedule for service and filing of the parties' papers is as follows:

Defendant/Movant to file and serve motion papers by September 18, 2017;

Plaintiffs/Respondents to file and serve opposition papers by October 2, 2017; and

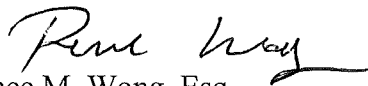
Defendant/Movant to file and serve reply papers by October 9, 2017.

The Court has set oral argument for October 23, 2017 at 4PM.

Dated: August 21, 2017

Respectfully submitted,

Goldberger & Dubin, P. C.

By:  Renee M. Wong, Esq.

TO: Clerk of the Court  
United States District Court  
Southern District of New York

Ra'Shaun J. Kelley  
Attorney for Plaintiffs